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A BTI AMERICAS PARTNER

December 3, 1997

051-97-2881-17

DEPARTMENT OF TRANSPORTATION

DOCKET SECTION

Docket Section United States Department of Transportation 400 7th Street SW Washington, DC 20590

Re: Airline Computer Reservation Systems (CRS)

To Whom It May Concern:

In reference to the above it is my understanding that the Department of Transportation regulations regarding airline computer reservation systems are up for renewal. In this regard I strongly urge the Department of Transportation to take a hard look at the current CRS practice of selling booking data to competitive carriers.

For example, Worldspan, which is the system we use, sells our booking data to US Airways -- the major carrier in the Pittsburgh area where we do much of our business. US Airways' ability to acquire this data substantially weakens any bargaining position that we may have relative to earnings from that carrier. Not only do I find this practice somewhat unethical but it is severely anti-competitive and, perhaps, in violation of anti-trust statutes.

With the elimination of all but one or two of the discount carriers that appeared at the onset of deregulation, the airline industry is really managed by a handful of mega-carriers. As the travel industry continues to change, airlines are increasingly becoming more competitive and adversarial with the agency community. Allowing them to acquire this data continues to put the agency community at the mercy and whims of these few mega-carriers.

If you wish to discuss this practice in greater detail, or would like to speak with me personally, I can be reached at 800-245-1099.

Sincerely

Marc Zelenski

Chief Operating Officer

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